

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Johnnelle J. Raines,)
)
)
Plaintiff,)
)
)
vs.) C.A. No.: 8:15-cv-05093-BHH
)
)
City of Easley, Easley Police)
Department, Tim Tollision,)
individually, and in his official)
capacity as Chief of Police of)
the Easley Police Department, and)
Larry Bagwell, in his official capacity as)
Mayor of the City of Easley,)
)
)
Defendants.)
)

The Plaintiff and the Defendants hereby make a joint motion for a consent order and decree resolving all of the issues currently before the Court. A proposed order is being sent to the Court contemporaneously with the filing of this motion. The Parties have reached an agreement on the Plaintiff's claims, as set forth:

The Plaintiff filed and served a Summons and Complaint against the Defendants in the above referenced matter. The Plaintiff sought monetary and injunctive relief against the Defendants in the Complaint. As such, the parties request that the Court issue an order that the Plaintiff and the Defendants are bound by the following agreement:

1. For parades organized by the City of Easley or any of its political subdivisions and not permitted to an outside entity, the Defendants will not interfere with or in any way prevent the Plaintiff, and those she chooses to

associate with in the parade, from marching or participating in the parade nor will the Defendants interfere with or in any way prevent the Plaintiff, and those she chooses to associate with in the parade, from carrying or displaying signs, messages, or banners during the parade except as provided by law.

2. The Defendants will pay to the Plaintiff, within ten (10) days of the date of the entry of this Consent Order and Decree, an amount that has been agreed to by the parties. The Defendants will also pay to Samuel D. Harms, Esq., the attorney for the Plaintiff, within ten (10) days of the date of the entry of this Consent Order and Decree, an amount for attorney's fees and costs that has also been agreed to by the parties.

3. This case is dismissed subject to the terms and conditions of this Consent Order and Decree.

Respectfully Submitted,

HARMS LAW FIRM, P.A.

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